UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

ICA,
Case No: 1:18-cr-167-15
Hon. Paul L. Maloney
United States District Judge

DEFENDANT'S MOTION FOR A DOWNWARD VARIANCE

Defendant, Shamekia Liptrot, through counsel, pursuant to Local Criminal Rule 32.2(g), respectfully moves this Court to impose a sentence that varies below the Sentencing Guidelines. This request is based on the application of the sentencing factors set forth in 18 U.S.C. § 3553(a) and the reasons set forth in Defendant's Sentencing memorandum.

Dated: December 30, 2019 Respectfully Submitted,

> /s/ Cirilo Martinez By: Cirilo Martinez, Attorney for Defendant 3010 Lovers Lane Kalamazoo, Michigan 49001

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